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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 15-71102 MAG
)	
Plaintiff,)	
)	STIPULATION TO EXCLUDE TIME AND
v.)	[PROPOSED] ORDER
)	
DAMIEN THOMAS,)	
)	
Defendant.)	

Defendant Damien Thomas' initial appearance before this Court was on August 28, 2015. At that time, at the request of the parties, the Court set the dates for the defendant's preliminary hearing or arraignment on September 11, 2015. The parties request that pursuant to Federal Rule of Criminal Procedure ("FRCP") 5.1(d), the time limits set forth in FRCP 5.1(c) be extended through September 18, 2015. The parties agree that, taking into account the public interest in prompt disposition of criminal cases, good cause exists for this extension.

The defendant also agrees to exclude for this period of time any limits applicable under 18 U.S.C. § 3161. The parties agree that the continuance represents the reasonable time necessary for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of

STIPULATION AND [PROPOSED] ORDER
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FILED

SEP 11 2015

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

1 justice served by granting such a continuance outweighed the best interests of the public and the
2 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

3 Undersigned defense counsel represents that she has spoken with her client, Damien Thomas,
4 and that he consents to and joins in this request.

5 SO STIPULATED:

Respectfully submitted,

6 BRIAN J. STRETCH
7 Acting United States Attorney

8 DATED: September 10, 2015

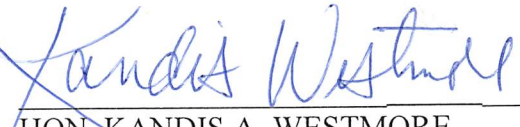
9 /s/
KATHYRN ROSS
Attorney for Damien Thomas

10 DATED: September 10, 2015

11 /s/
MAUREEN C. BESSETTE
Assistant United States Attorney

12
13 IT IS SO ORDERED.

14
15 DATED: 9/11/15

16 
HON. KANDIS A. WESTMORE
United States Magistrate Judge